

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

**IN THE MATTER OF**

**CASE NO. 19-01722-MCF**

**JOSE LUIS CORREA GONZALEZ  
XXX-XX-3630  
Debtor(s)**

**CHAPTER 13  
ASSET CASE**

**REPLY TO THE TRUSTEE'S MOTION TO DISMISS  
DATED JULY 17, 2020**

**TO THE HONORABLE COURT**

**NOW COMES**, Debtor through the undersigned attorney and very respectfully states and prays as follows:

1. In December 18, 2019 Petitioner amended schedule I and J. In Schedule I Debtor reported his entire social security benefit of \$1,011. In Schedule J debtor reported a monthly chapter 13 payment of \$2,040. The above was based on the following premise as stated in our motion then: "Amended Schedule I is submitted to inform Debtor's social security benefit of \$1,011 has been restored effective January 2020. As per conversation with attorney, Myriam Hernandez, ASUME representative; ASUME discontinued the Social Security Administration retention order of \$600 on December 13, 2019".
2. Petitioner has informed us that, as of today, ASUME has continued with the Social Security Administration retention order of \$600 (actually \$621). See attached social security deposits of \$414.40 in the bank statements.
3. Also, attached ASUME account summary. It reflects the payments of \$621 received from the social security administration retention order.
4. Accordingly, Petitioner's monthly payment to the chapter 13 Trustee should be reduced. His arrears with ASUME have also been reduced and will continue to be reduced because of the direct payments received from the social security administration retention order still in effect.
5. Petitioner has informed us that he incurred in arrears for various reasons among them the following:
  - A. Last Monday Petitioner was released from the Veteran's Hospital. He was admitted to the hospital on an emergency basis from a fall he suffered. With the fall he bruised several ribs, one of his hands and one of his legs. He was in the hospital for approximately 11 days.

- B. Petitioner's mother retirement pay direct deposit, for reasons unknown, was stopped from the middle of February 2020 through May 2020. During that time he helped her with her rent payment and food expenses.
  - C. Petitioner also suffered a minor car accident. His vehicle is in need of repairs.
6. Petitioner is filing amended schedule I and J and amended plan.

**WHEREFORE**, for the above stated reasons it is respectfully requested from this Honorable Court to enter an order denying the trustee's motion to dismiss.

**I HEREBY CERTIFY**: that a copy of this motion was electronically filed by debtor using the CM/ECF System which will send a notification to the standing Chapter 13 Trustee and to all registered interested parties. In addition, a copy of this motion was sent by debtor's attorney to the debtor at the address of record and to all creditors and parties in interest appearing in the master address list not registered in CM/ECF.

**RESPECTFULLY SUBMITTED**  
**IN CAROLINA, PUERTO RICO, AUGUST 21, 2020.**

/s/ Ramón F. López  
RAMON F. LOPEZ, ESQ. (203813)  
RAMON F. LOPEZ LAW OFFICES, P.S.C.  
ATTORNEY FOR THE ABOVE NAMED DEBTOR  
PO BOX 34173  
FT BUCHANAN PR 00934  
PHONE (787) 276-0196  
[RAMONLOPEZLAW@GMAIL.COM](mailto:RAMONLOPEZLAW@GMAIL.COM)






## Servicios en Línea

**Número de caso:** 0257218

**Nombre de PNC:** Jose L  
Correa  
Gonzalez

**Núm. de participante:** 000000001149157

Fecha de recibido	Cantidad de Pago	Referencia
08/05/2020	\$540.00	030012484
08/03/2020	\$621.60	029996498
07/03/2020	\$541.20	029865869
07/02/2020	\$621.60	029856588
06/03/2020	\$621.60	029691614
05/01/2020	\$621.60	029534324
04/03/2020	\$621.60	029424009
03/06/2020	\$1,212.70	029297768
03/03/2020	\$621.60	029278414
02/03/2020	\$621.60	029136706

		 59%  10:25 AM	
- \$41.96		04/01/2020	
ECONO FACUNDO VILLA CAR			
- \$104.78		04/01/2020	
ATH WITHDRAWAL WALGREENS PLAZA CAROLINA BPPR ON 04/01/20			
- \$60.00		04/02/2020	
TMOBILEAUTO PAY ON 04/01/20			
- \$133.48		04/02/2020	
AUTORIDAD DE ACUEDUCTOS			
- \$25.53		04/02/2020	
SSA TREAS 310 XXSOC SEC			
+ \$414.40		04/03/2020	
SEP SHELL SERVICES			
- \$9.75		04/03/2020	
TELEPAGO TRANSFERENCIA A CUENTA AHORROS			
- \$42.00		04/03/2020	
ATH WITHDRAWAL BPPR PLAZA CAROLINA 1 ON 04/04/20			
- \$100.00		04/06/2020	

BANCO POPULAR DE PUERTO RICO  
P.O. BOX 362708  
SAN JUAN PR 00936-2708

JOSE L. CORREA GONZALEZ  
VILLA FONTANA  
3BN7 VIA 62  
CAROLINA PR 00983

223-049396  
ACCESO POPULAR

11784

Este estado cubre sus transacciones después del 14 de abril de 2020 hasta el 13 de mayo de 2020. Página 1

### CHEQUES

INFORMACIÓN DE BALANCE

Balance inicial	+ Créditos	- Cheques/Débitos	- Cargos	= Balance final
61.18	3,695.01	3,581.64	2.00	172.55

#### CRÉDITOS REGulares Y ELECTRÓNICOS

Fecha	Descripción	Cantidad
05-01	Depósito	1.39
05-01	Depósito	3,279.22
	Vacp Treas 310 Xxva Benef	

#### DÉBITOS REGulares Y ELECTRÓNICOS

Fecha	Descripción	Cantidad
04-15	Pago	9.00
	Sep Shell Service Carolina	
04-16	Pago	9.00
	Sep Shell Service Carolina	
04-17	Pago	9.00
	Sep Shell Service Carolina	
04-17	Pago	9.00
	Sep Shell Service Carolina	

Fecha	Descripción	Cantidad
05-01	Depósito	414.40
	Ssa Treas 310 Xxsoc Sec	
05-04	TelePago	42.00
	Transferencia a Cuenta Ahorros	
05-05	Retiro ATH	100.00
	BPPR Campo Rico 3	
05-05	Pago	9.00
	Sep Shell Service Carolina	
05-05	Pago	9.00
	Sep Shell Service Carolina	
05-05	Retiro ATH	160.00
	05-05 2786	

JOSE L. CORREA GONZALEZ  
VILLA FONTANA  
3BN7 VIA 62  
CAROLINA PR 00983

223-049396  
ACCESO POPULAR

12531

Este estado cubre sus transacciones después del 13 de mayo de 2020 hasta el 12 de junio de 2020. Página 1

### UES

IN DE BALANCE

Balance inicial	+ Créditos	- Cheques/Débitos	- Cargos	= Balance final
172.55	3,693.62	3,644.88	2.00	219.29

#### REGulares Y ELECTRÓNICOS

Fecha	Descripción	Cantidad
06-01	Depósito	3,279.22
	Vacp Treas 310 Xxva Benef	

#### REGulares Y ELECTRÓNICOS

Fecha	Descripción	Cantidad
05-15	Pago	9.00
	Sep Shell Service Carolina	

Fecha	Descripción	Cantidad
06-03	Depósito	414.40
	Ssa Treas 310 Xxsoc Sec	
06-02	Pago	240.84
	Tmobile*auto Pay	
06-01		4206
	800-937-8 Wa	
06-02		4206



223-1  
ACCESO POPULAR

JOSE L. CORREA GONZALEZ  
VILLA FONTANA  
3BN7 VIA 62  
CAROLINA PR 00983

12714

Página 1

Este estado cubre sus transacciones después del 12 de junio de 2020 hasta el 14 de julio de 2020.

### CHEQUES

INFORMACIÓN DE BALANCE

Balance inicial	+ Créditos	- Cheques/Débitos	- Cargos	= Balance final
219.29	3,693.62	3,798.78	2.00	112.13

### DÉBITOS REGulares Y ELECTRÓNICOS

Fecha	Descripción	Cantidad
07-01	<b>Depósito</b> XXXXXX3600	3,279.22
	Vacp Treas 310 Xxva Benef	

### CARGOS REGulares Y ELECTRÓNICOS

Fecha	Descripción	Cantidad
06-15	<b>Retiro ATH</b> 06-13 8425	20.00
06-16	BPPR Campo Rico 2	

Fecha	Descripción	Cantidad
07-02	<b>Depósito</b> XXX-XX-3630	414.40
	Ssa Treas 310 Xxsoc Sec	
07-03	<b>Retiro ATH</b> 07-02 7867	100.00
	BPPR Plaza Carolina 2	
07-03	<b>Pago</b> 07-02 XXXXXXXXXXXXXXX4206	97.67

AR RESOURCES  
PO Box 1056  
Blue Bell, PA 19422

ASUME  
PO BOX 70376  
San Juan, PR 00936

BANCO SANTANDER  
PO BOX 362589  
San Juan, PR 00936-2589

BANCO SANTANDER  
PO BOX 362589  
San Juan, PR 00936-2589

BANK OF AMERICA  
PO BOX 982238  
El Paso, TX 79998-2235

CARLOS LOZADA  
URB. VILLA CAROLINA  
AVE. SANCHEZ OSORIO

CARMEN L. DIAZ MARRERO  
URB. VILLA FONTANA  
VIA 62 3BN7  
Carolina, PR 00983

CLARO  
PO BOX 70367  
San Juan, PR 00936-8367

CMRE  
3075 IMPERIAL HWY  
SUITE 200  
Brea, CA 92821

COX  
P.O. Box 78071  
Phoenix, AZ 85062-8071

HOME DEPOT  
PO BOX 9001010  
Louisville, KY 40290-1010

NAVY FEDERAL CREDIT UNION  
PO BOX 3000  
Merrifield, VA 22119-3000

PROGRESSIVE MANAGMENT SYSTEM  
1521 WEST CAMERON AVENUE  
West Covina, CA 91790

T-MOBILE  
654 AVE MUNOZ RIVERA  
SUITE 2  
San Juan, PR 00918